

In the Matter of Rockland Trust Company (July 25, 1989)

The State Ethics Commission fined Rockland Trust Company \$4000 for continuing to sponsor a summer cruise for municipal treasurers despite a published report from the Inspector General indicating that such behavior raised serious conflict of interest concerns. According to a Disposition Agreement reached with the Ethics Commission, Rockland Trust admitted to violating Section 3 of Massachusetts General Laws c. 268A in both 1986 and 1987, and agreed to pay the fine. The bank was fined \$2000 for each of the two cruises. Section 3 of the conflict law prohibits the giving of anything of substantial value (\$50 or more) to public employees for or because of their official position, or because of anything done or to be done by them in their official capacity. This prohibition includes providing meals, entertainment, or any other item of substantial value to a public employee in an attempt to foster good will. Prior to November 1985, the Agreement said, there was a widespread practice of banks paying for entertainment of public officials who managed municipal funds. However, on November 23, 1985, the Office of the Inspector General (IG) issued a document entitled "Report on Municipal Banking Relations," which among other things warned that conduct of this type raised serious concerns under the conflict law. Following the publication of the IG's report, officials in the marketing department of Rockland Trust Company discussed what, if any, impact the report should have on their annual summer outing, to which it invited all members of the Plymouth County Collectors and Treasurers Association (PCCTA). Without consulting the Inspector General or the State Ethics Commission, they concluded the report did not apply to their function, the Disposition Agreement said. The annual dinner cruise was held on August 13, 1986, and all members of the PCCTA, as well as treasurers from towns outside Plymouth County, were invited to attend. Rockland Trust held its next summer outing on August 25, 1987, and again invited all members of the PCCTA and treasurers from other communities, the Agreement said. The bank cancelled its 1988 summer outing after being contacted and questioned by the Ethics Commission regarding the previous cruises.